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March 10, 2015

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MAR 10 2015

Hon. Charles J. Siragusa
United States District Judge
Western District of New York
1360 U.S. Courthouse
100 State Street
Rochester, New York 14614

CHARLES J. SIRAGUSA
United States District Judge
Western District of New York
via facsimile
& via first class mail

Re: *Montgomery vs. Cuomo, et al.*
Docket No.: 6:14-cv-06709

To the Hon. Charles J. Siragusa:

This letter respectfully requests permission to submit a Memorandum of Law on behalf of the Plaintiffs in excess of 25 pages, up to and including 60 pages.

I am substantially through my draft of the Memorandum, as well as the answer to the three defense motions for various relief to dismiss claims, attack standing, and challenge venue, their supporting witness statements, additional exhibits, and memorandum citations. I write in support of the sufficiency of four claims plus damages on behalf of five plaintiffs, in addition to responding to the additional requests for relief.

I will also be submitting a limited Cross-Motion concerning the defense exhibits and, because the State provided an unexpected amount of information of assistance to the Plaintiffs, an offer of a Second Amended Complaint with leave to serve the same if the Court is otherwise inclined to grant the defense motions.

It is with these final decisions made and my work substantially undertaken that I submit this request. Thank you for your consideration.

Respectfully,

Paloma A. Capanna
Paloma A. Capanna

Paloma A. Cappanna, Attorney

March 10, 2015

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c. (via facsimile & first class mail):

William J. Taylor, Jr., Assistant Attorney General

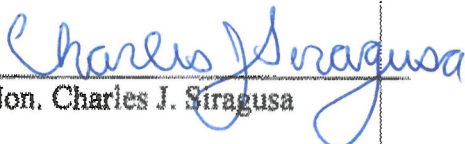
Rudolph M. Baptiste, Assistant County Attorney

Catherine A. Brennan, Attorney

United States District Court
Western District of New York
Hon. Charles J. Siragusa, presiding

Upon consideration of the request of Counsel to the Plaintiffs, it is so ordered that she may submit a Memorandum in support of the Plaintiffs' requests for relief in the amount of 60 pages.

It is so ordered this 11 day of March 2015.


Hon. Charles J. Siragusa